



Local Telephone Service • Long Distance • Internet Access • Data Communications

Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: EB-06-TC-060**  
**CPNI Compliance Certification**

Dear Ms. Dortch:

This filing is in response to the Commission's directive to file on or before February 6, 2006, Mid-Maine TelPlus (Company) CPNI Compliance Certification. As required in that compliance certification, Company is providing her a certification statement signed by an officer of the Company and a general statement of processes in place to insure ongoing compliance with the use of CPNI.

While the Company is confident of its compliance in this matter, it recognizes that recent industry events remind it that it must remain diligent in implementing strict procedures and controls that prevent disclosure of CPNI in violation of the Commission rules. To that end, it is reviewing current operating procedures with the intent to supplement or modify them as needed.

The undersigned may be contacted should you have any questions or require additional information.

Respectfully submitted,

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Enclosure

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### CERTIFICATION

I, Nicholas Winchester, Vice-President of Mid-Maine TelPlus (the "Company") do hereby declare under penalties of perjury and in accordance with 47 CFR 64.2009(e) the following:

- I am an officer of the Company with personal knowledge and authority to make this certification.
- The Company has in place operating procedures to ensure its compliance with CPNI rules contained in 47 CFR 64, Subpart U, a copy of which are attached.
- The Company continues to undertake review of current actions and procedures to ensure full compliance with applicable FCC Rules.

This information regarding the Company and the Operating Guidelines that the Company has adopted in order to ensure compliance with the Rules set forth at 47 CFR 64, Subpart U, is true and accurate to the best of my knowledge, information, and belief.

Signature

Date



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## **Description of Operating Procedures Mid-Maine TelPlus**

### **Policy Statement:**

Mid-Maine TelPlus (Company) has elected not to utilize or provide CPNI for any purpose other than those purposes that are permissible without customer approval process codified in Section 64.2005 of the FCC's Rules and Regulations. The Company provides its customers notification of their rights with respect to their CPNI and has adopted the procedures set forth below to ensure familiarity and compliance with the applicable rules and to protect CPNI.

The Company does not disclose CPNI data to any third parties without a subpoena submitted to an officer of the Company.

### **Compliance Actions:**

The Company routinely includes in training the expectation that customer records are confidential and will not be disclosed to any third party or used by any employee for any reason. Employees are aware that violation is a disciplinary action that could include termination of employment. The Company reviews with all new employees and on a no-less-than-annual basis with existing employees, rules contained in Subpart U regarding the use of CPNI data.

The Company has defaulted all customers to "opt-in". On customer-initiated contacts with the company, prior to accessing CPNI to market any services, the Company requests permission from the customer to access CPNI records and that permission is noted in the notes field. If the customer chooses not to opt-in, this field is not populated and any marketing of services ceases. This field remains populated indefinitely until overwritten or deleted and is only in effect for the duration of the call during which the field was populated.

For its large business customers who are assigned an account manager by the Company, those end users provided a written letter of authority allowing Company to access all customer records as part of the account management and sales process. Those letters are in effect for a period of one year and are retained by the company. Although no customer has yet to do so, the letters allow the customer to terminate the authority for any reason through written or oral notice to the Company.

The Company does not allow its employees to have access to end user level detail of calling or feature utilization beyond that which is provided in end user billing. Any request for calling data on an end user specific basis (as described the example



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provided in 64.2005(b) (2)) requires a written request to an officer of the company. All officers are fully aware of and comply with all CPNI regulations.

Any independent contractor with access to CPNI data is required to sign a standard non-disclosure and compliance agreement. That agreement requires the return or destruction of any CPNI data upon termination of the project or contracting arrangement.